

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

IpLEARN, LLC, ,	)	
	)	
Plaintiff,	)	
	)	
v.	)	C.A. No. 11-825-RGA
	)	
BEELINE.COM, INC., et al.,	)	
	)	
Defendants.	)	

**STIPULATION AND ORDER TO EXTEND CERTAIN CASE DEADLINES**

Plaintiff, IpLearn, LLC (“IpLearn”), and defendants Halogen Software Inc. (“Halogen”), Mzinga, Inc. (“Mzinga”), and Technomedia Training, Inc. (“Technomedia”), hereby stipulate and agree, subject to the approval and Order of the Court, to extend the following case deadlines (see D.I. 170, 181, 183):

Event	Current Date	New Date
Halogen, Mzinga, and Technomedia respond to IpLearn’s First Set of Interrogatories and First Set of Requests for Production of Documents and Things	August 24, 2012	September 7, 2012
Exchange Rule 26(a)(1) initial disclosures	August 27, 2012	September 10, 2012
Exchange Paragraph 3 Initial Disclosures (under D. Del. Default Standard)	September 10, 2012	September 24, 2012
IpLearn serves Paragraph 4(a) Disclosures (under D. Del. Default Standard)	September 18, 2012	October 2, 2012

DATED: August 24, 2012

**CONNOLLY BOVE LODGE & HUTZ LLP**

*/s/ Arthur G. Connolly, III*

---

Arthur G. Connolly, III (#2667)  
The Nemours Building  
1007 North Orange Street  
Wilmington, DE 19801  
(302) 658-9141  
*AConnollyIII@cblh.com*  
*Attorneys for Plaintiff,*  
*IpLearn, LLC*

**YOUNG CONAWAY STARGATT & TAYLOR LLP**

*/s/ Karen L. Pascale*

---

Karen L. Pascale (#2903)  
James L. Higgins (#5021)  
The Brandywine Building  
1000 West Street, 17th Floor  
Wilmington, DE 19801  
(302) 571-6600  
*kpascale@ycst.com*  
*jhiggins@ycst.com*  
*Attorneys for Defendants*  
*Halogen Software Inc., Mzinga, Inc. and*  
*Technomedia Training, Inc.*

SO ORDERED this \_\_\_\_\_ day of August, 2012.

---

UNITED STATES DISTRICT JUDGE

**CERTIFICATE OF SERVICE**

I, Karen L. Pascale, Esquire, hereby certify that on August 24, 2012, I caused to be electronically filed a true and correct copy of the foregoing document with the Clerk of the Court using CM/ECF (which will send notification that such filing is available for viewing and downloading to all registered counsel), and in addition caused true and correct copies of the foregoing document to be served upon the following counsel of record in the manner indicated::

**By E-Mail**

Arthur G. Connolly, III ("Chip") [aconnollyIII@cblh.com]  
CONNOLLY, BOVE, LODGE & HUTZ LLP  
The Nemours Building  
1007 North Orange Street  
P.O. Box 2207  
Wilmington, DE 19899

*Plaintiff, IpLearn, LLC*

Marc A. Fenster [mfenster@raklaw.com]  
Benjamin T. Wang [bwang@raklaw.com]  
Fredricka Ung [fung@raklaw.com]  
RUSS AUGUST & KABAT  
12424 Wilshire Blvd., Suite 1200  
Los Angeles, CA 90025

*Plaintiff, IpLearn, LLC*

William J. Wade [wade@rlf.com]  
Anne Shea Gaza [gaza@rlf.com]  
RICHARDS, LAYTON & FINGER, PA  
One Rodney Square  
920 N. King Street  
Wilmington, DE 19801

*Defendant Beeline.com, Inc.*

Daniel M. Silver [dsilver@mccarter.com]  
MCCARTER & ENGLISH, LLP  
Renaissance Centre  
405 N. King Street, 8th Floor  
Wilmington, DE 19801

*Defendant Connections Education LLC*

Philip A. Rovner [provner@potteranderson.com]  
POTTER ANDERSON & CORROON, LLP  
1313 N. Market St., Hercules Plaza, 6th Flr.  
P.O. Box 951  
Wilmington, DE 19899-0951

*Defendant Element K Corporation*  
*Defendant The Ultimate Software Group Inc.*  
*Defendant Cengage Learning Inc.*

Rodger D .Smith, II [rsmith@mnat.com]  
MORRIS, NICHOLS, ARSHT & TUNNEL LLP  
1201 N. Market Street  
Wilmington, DE 19801

*Defendant Kenexa Corporation*

Mary B. Graham [mgraham@mnat.com]  
Jeremy A. Tigan [jtigan@mnat.com]  
MORRIS, NICHOLS, ARSHT & TUNNEL LLP  
1201 N. Market Street  
Wilmington, DE 19801

*Defendant Oracle Corporation*

John W. Shaw [jshaw@shawkeller.com]  
Andrew Russell [arussell@shawkeller.com]  
SHAW KELLER LLP  
300 Delaware Avenue, Suite 1120  
Wilmington, DE 19801

*Defendant NCS Pearson Inc.*

**YOUNG CONAWAY STARGATT & TAYLOR, LLP**

*/s/ Karen L. Pascale*

August 24, 2012

---

Karen L. Pascale (No. 2903) [kpascale@ycst.com]  
Rodney Square  
1000 North King Street  
Wilmington, Delaware 19801  
Telephone: 302-571-6600

*Attorneys for Defendants Halogen Software Inc.,  
Mzinga, Inc., and Technomedia Training, Inc.*